IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY (Newark)

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ELIZABETH MATOS : Civil Action No.

Plaintiff

: 2:18-cv-008009

: NOTICE OF REMOVAL

COLLECTION BUREAU OF THE : HUDSON VALLEY, INC.; : ABC CORPS I-X :

VS.

Defendants

TO THE CLERK OF THE COURT:

PLEASE TAKE NOTICE that Defendant Collection Bureau of the Hudson Valley, Inc. (hereinafter "CBHV"), by and through its undersigned counsel respectfully notifies this Court of the removal of the above-captioned matter from the Superior Court of New Jersey, Law Division – Special Civil Part, Essex County to the United States District Court for the District of New Jersey as follows:

- 1. This action was commenced in the Superior Court of New Jersey, Law Division Special Civil Part, Essex County, by the filing of a Complaint on March 12, 2018, titled Elizabeth Matos v. Collection Bureau of the Hudson Valley, Inc., et al, Docket Number DC-004034-18 (hereinafter "the State Court Action"). A true and accurate copy of the Civil Action Summons and Complaint are annexed hereto as one Exhibit "A" pursuant to 28 U.S.C. § 1446(a).
 - 2. CBHV was served with the Summons and Complaint on March 19, 2018.

3. Plaintiff brought this action for alleged violations by CBHV of the Fair Debt

Collection Practices Act, Section 1692 et seq., of Title 15 of the United States Code (See

Complaint, ¶ 1 "Jurisdiction and Venue"). As such, this is a claim over which the District Court

has jurisdiction based on a federal question pursuant to 28 U.S.C. § 1331; thus, same is

removable to the District Court of New Jersey under 28 U.S.C. § 1441.

4. The instant Notice of Removal is being filed within the thirty (30) day time-frame

as allowed under the Federal Rules of Civil Procedure. Therefore, pursuant to 28 U.S.C. §

1446(b), the instant Notice of Removal is timely.

5. CBCV will give written notice of the filing of this Notice of Removal to all

adverse parties, as required by 28 U.S.C. 1446(d).

6. CBHV will file a true and accurate copy of this Notice of Removal with the Clerk

of the Superior Court of New Jersey, Law Division - Special Civil Part, Essex County, as

required by 28 U.S.C. § 1446(d).

WHEREFORE, CBHV respectfully requests that the aforementioned State Court

Action, now pending in the Superior Court of New Jersey, Law Division – Special Civil Part,

Essex County, be removed to the United States District Court for the District of New Jersey.

Respectfully submitted,

BARRON & NEWBURGER, P.C.

Dated: April 18, 2018 By: ____s/Mitchell L. Williamson__

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Attorneys for Defendant, CBHV Adjustment Services, Inc.